

DuPage County Farm Bureau

245 S. Gary Avenue • Carol Stream, Illinois 60188-2096 • (630) 668-8161

August 30, 2000

U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, D.C. 20460

Re: Mississippi River/Gulf of Mexico Action Plan (4503F)

Gentlemen:

On behalf of the farmers in DuPage County, Illinois, and the surrounding area, we thank you for this opportunity to express our concerns about the Mississippi River/Gulf of Mexico Action Plan (4503F).

Our concerns are enumerated as follows:

- 1.) The draft Action Plan does not contain a cost/benefit analysis. The legislation creating the Watershed Nutrient Task Force requires the President, in conjunction with the governors of the affected states, to submit a plan to address hypoxia in the Gulf of Mexico including a description of the social and economic costs and benefits.
- 2.) The effects of nitrate reduction on agriculture are not known.
- 3.) The Action Plan calls for language that indicates the state will adopt water quality standards for nutrients. It is not clear whether or not there is intent to pursue regulatory methods of achieving those standards.
- 4.) The Action Plan has been pushed through even though there have been strong questions raised by many in the scientific community about the need for additional time to consider this issue and the proposed solutions.
- 5.) Not all of the options have been studied that would address this issue. Flow management at critical times of the year needs to be investigated immediately. (Point #9 of the Action Plan)

6.) We feel there should be no numeric goals for reduction of nitrogen loadings in the Plan because of the aforementioned reasons.

We thank you again for the opportunity to submit our concerns and hope that they will at least be given some consideration and discussion before any plan is adopted.

Sincerely,

Jack L. Young

President

DuPage County Farm Bureau